



PUBLIC WORKS

0276
Department of Ecology
Water Quality Program
DEC 21 2004

December 17, 2004

Ken Koch
Wash St Dept of Ecology
Water Quality Program
P.O. Box 47600
Olympia, Washington 98504-7600

Subj.: Section 303d Comments

Dear Mr. Koch:

Thank you for the opportunity to comment on the revised 303(d) list for impaired water bodies in Washington State. The City of Everett provided many comments on the original 303(d) list in March 2004. It is apparent that the Dept. of Ecology seriously considered our concerns and changed the list in accordance with our suggestions. On behalf of the City of Everett, I want to thank you and all other department employees that worked on revising the 303(d) list.

Our only concern with the revised 303(d) list is the Department's response to our comment that DNA analysis in Swamp Creek indicates that high fecal coliform counts in Swamp Creek is due to natural sources of bacteria such as wildlife (listing ID 12565). Ecology's response was that an upcoming TMDL study of Swamp Creek would help determine whether high fecal coliform counts were due to natural or anthropogenic sources. This is contrary to our experiences with past TMDL studies.

TMDL studies of fecal coliform in the lower Snohomish River tributaries (WRIA 7) and in North Creek (WRIA 8) were conducted in 2002. Neither of these TMDL studies distinguished between natural and anthropogenic sources of bacteria. If the Department can commit to providing sufficient funding for a thorough analysis of natural and anthropogenic sources, the City of Everett would support Swamp Creek's inclusion on the 303(d) list for fecal coliform. However, if sufficient funding cannot be committed, the City of Everett does not support Swamp Creek's inclusion on the 303(d) list for fecal coliform.

Again, thank you for the opportunity to comment on the revised 303(d) list. If you have questions regarding our comments, please contact me at (425) 257-8855 or dmathias@ci.everett.wa.us.

Sincerely,

Dan Mathias, P.E.
Principal Engineer

KenK1217

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